

# **EXHIBIT B**

## **Declaration of Wm. Hunter Campbell**

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14 *Attorneys for Defendant Zuffa, LLC, d/b/a*  
15 *Ultimate Fighting Championship and UFC*

17 UNITED STATES DISTRICT COURT

18 DISTRICT OF NEVADA

19 Cung Le, Nathan Quarry, Jon Fitch, Brandon  
20 Vera, Luis Javier Vazquez, and Kyle Kingsbury,  
on behalf of themselves and all others similarly  
21 situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

25 Defendant  
26

No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF W. HUNTER  
CAMPBELL IN SUPPORT OF  
DEFENDANT ZUFFA, LLC'S  
MOTION TO SEAL EXHIBITS AND  
PROTECTED MATERIALS AT THE  
EVIDENTIARY HEARING ON  
CLASS CERTIFICATION**

1 I, William Hunter Campbell, declare as follows:

2 1. I am over 21 years old. I have personal knowledge of the facts stated in this  
3 declaration and if called to testify, I could and would competently testify to these facts. I am a  
4 member in good standing of the State Bar of Nevada. I am Of Counsel to the law firm of Campbell  
5 & Williams and Chief Business Officer (CBO) and Executive Vice-President of defendant Zuffa,  
6 LLC (“Zuffa”), d/b/a Ultimate Fighting Championship® (“UFC”). UFC is a mixed martial arts  
7 (“MMA”) promoter. Prior to serving as Zuffa’s CBO, I was the Chief Legal Officer with Zuffa from  
8 2017 to 2019, and prior to 2017 I represented Zuffa as outside counsel on several matters.

9 2. I make this declaration in support of Zuffa’s Motion to Seal Exhibits and Protected  
10 Materials at the Evidentiary Hearing on Class Certification (“Motion to Seal”).

11 3. Through my role as Zuffa’s CBO and CLO, as well as from my representation of  
12 Zuffa, I am familiar with Zuffa’s practice of maintaining the confidentiality of Zuffa’s financial  
13 information. Zuffa executives and employees keep financial information—including revenue and  
14 compensation information, both on an individual and aggregate level—private and confidential.  
15 Zuffa’s event-level financials, including compensation and spending information, are considered  
16 highly confidential. All of this information also constitutes highly sensitive business information  
17 that we keep private, as such information would allow competitors to gain competitive advantages  
18 over us in the marketplace, including but not limited to, allowing those competitors to have a tactical  
19 advantage over Zuffa in negotiations with venues, sponsors, athletes, and others. Public release of  
20 this information would thus cause Zuffa competitive harm.

21 4. Zuffa’s highly sensitive financial information, business information, financial  
22 planning, modeling, and related strategic documents and communications from the past five years  
23 (post-2013) are particularly sensitive because they reflect Zuffa’s current financial decisions and  
24 business strategies. They represent Zuffa’s most recent decisions and strategies, information that  
25 Zuffa’s competitors could use to have a tactical advantage over Zuffa, as described in the paragraphs  
26 above. Release of this most recent information from the past 5 years would cause Zuffa the greatest  
27 competitive harm.



1           5.       Zuffa is a subsidiary of Endeavor Group Holdings, Inc. (“Endeavor”), which filed for  
2       an initial public offering (IPO) on May 23, 2019. Zuffa, however, is merely one of Endeavor’s  
3       many holdings, the limited public release of Endeavor’s financial information as part of its IPO does  
4       not include the public release of all of Zuffa’s financial information. Although Endeavor has  
5       released a high-level overview of some of Zuffa’s financial information during the limited period of  
6       January through August, 2016, the remainder of Zuffa’s revenue, expenses, compensation, and other  
7       financial information remains private on a yearly, quarterly, and event-by-event basis. The only  
8       exception is that, at times, Zuffa discloses certain financial information to third-party credit rating  
9       agencies and banks, who receive this information under an obligation to maintain its confidentiality.  
10      Zuffa’s detailed revenues and expenses, particularly on an event-level basis, remain competitively  
11      sensitive and would, if publicly released, provide competitors with an insight into how Zuffa chooses  
12      to invest.

13           6.       Zuffa also works diligently to keep its financial planning, modeling, and related  
14      strategic documents and communications highly confidential and does not disclose these secrets and  
15      materials publicly. Zuffa regularly makes strategic decisions about where and how to invest, as well  
16      as valuations of different assets, and other similar trade secret business strategies. Release of this  
17      information would allow competitors to understand Zuffa’s product investment, development, and  
18      innovation strategies, thereby giving them an undue advantage.

19           7.       As with its financial information, Zuffa’s trade secret business strategy information  
20      from the past five years (post-2013) is also the most sensitive information of this type because it  
21      represents Zuffa’s most recent strategic decisions. Many of these strategies continue to be in  
22      operation and implemented regularly, and release of this information would cause competitive harm  
23      to Zuffa by revealing its business model to competitors, giving them an unearned competitive  
24      advantage and an opportunity to mimic Zuffa’s successful model.

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing facts are true and correct. Executed this 14th day of June, 2019 in Las Vegas, NV.

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4 /s/ Wm. Hunter Campbell  
5 Wm. Hunter Campbell  
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